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 Before the  
 FEDERAL COMMUNICATIONS COMMISSION  
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matters of:

Amendment of the Commission's  
 Rules to Establish Rules and  
 Policies Pertaining to Mobile-  
 Satellite Service and Radio  
 Determination Satellite Service  
 in the 1610-1626.5 MHz and  
 2483.5-2500 MHz Bands; and

Amendment of Section 2.106 of  
 the Commission's Rules to  
 Allocate the 1610-1626.5 MHz  
 and the 2483.5-2500 MHz Bands  
 for Use by the Mobile-Satellite  
 Service, Including Non-  
 Geostationary Satellites.

Implementation of Section 309(j)  
 of the Communications Act  
 Competitive Bidding

CC Docket No. 92-166

ET Docket No. 92-28

PP Docket No. 93-253

**EX PARTE PRESENTATIONS**

Pursuant to Section 1.1206 of the Commission's rules and regulations, Motorola Satellite Communications, Inc. ("Motorola") and Loral Qualcomm Satellite Services, Inc. ("LQSS") hereby report that ex parte presentations were made by representatives of Motorola and LQSS on January 5, 1994, to the persons identified on the attached list. The subject matters discussed during these presentations are reflected in the Joint Comments filed on October 7, 1993, by Motorola and LQSS in CC Docket No. 92-166 and ET Docket No. 92-28, and the separate Comments and Reply Comments filed on November 10 & 30, 1993 by Motorola and LQSS in PP Docket No. 93-253. The participants also discussed the matters covered in the attached materials.

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Copies of this notice are being filed with the Secretary and are being sent to the persons identified on the attached list.

Respectfully submitted,

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List of Persons Attending Presentations

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## **Comparison of Elements of a Consensus (Motorola/Loral Qualcomm) and TRW Spectrum Sharing Plans**

### **Common Elements of Both Plans**

- 1. Avoids use of auctions to assign licenses**
- 2. Permits both CDMA and bidirectional FDMA systems to operate in the bands**
- 3. Limits use of bands to non-geostationary satellite systems**
- 4. Access to spectrum would be limited to pending applicants**
- 5. Authorizes construction of systems capable of operating across the available bandwidth**
- 6. Imposes rigid construction milestones that would be strictly enforced**
- 7. Bidirectional FDMA/TDMA system would have access to top portion of 1610-1626.5 MHz band**
- 8. CDMA systems would be able to combine their spectrum assignments and share their portion of the L and S bands**
- 9. U.S. government must get Russian Federation to reconfigure GLONASS to operate below 1610 MHz and thereby open up entire 1610-1626.5 MHz band for MSS operations**

## **Key Differences In Sharing Plans**

### **Elements of a Consensus Plan**

**Spectrum would be assigned initially on a "start big and cut back" basis as each system becomes operational. Available spectrum would be divided among operational systems in proportion to their number. Later, periodic adjustments of spectrum assignments would be made based upon actual usage.**

- **Ensures that spectrum resource will be used to its fullest at all times**
- **Self adjustment mechanism for assigning spectrum to systems most in need of it**
- **Eliminates possibility of trafficking in FCC authorizations since only operational systems get any spectrum**
- **Makes no assumptions as to which technology and how many systems will prevail in the marketplace**

### **TRW Plan**

**Guarantees access to portion of spectrum based solely upon access technique (FDMA/TDMA vs. CDMA). Reserves for possible future assignment a substantial portion of available spectrum**

- **A priori division of spectrum inappropriate since do not know today how many of each type of system will ever become operational**
- **By basing spectrum assignments on access technologies does not necessarily reflect spectrum needs of particular systems and could result in an imbalance among systems in terms of spectrum assignments**
- **Should not be reserving spectrum in view of existing scarcity and current demand**

## Key Differences In Sharing Plans

### Elements of a Consensus Plan

**Rigid financial and technical qualifications standards**

- Ensures that only those entities ready, willing and able to proceed with business plans get an authorization
- Ensures that only spectrum efficient systems are built
- Eases international coordination of systems since only real systems would have to be coordinated with foreign systems
- Ensures that all of CONUS is served all of the time

### TRW Plan

**Minimal qualification standards, relying instead on construction and launch milestones to weed out applicants.**

- Will allow those entities not serious about going forward to traffic in an FCC authorization
- Will cause unnecessary international coordination problems for the U.S. since coordination will likely include systems that will never become operational
- Will allow for inefficient systems without complete coverage of CONUS to use spectrum at expense of high capacity, full coverage systems